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Attorneys for Plaintiff Richard M. Pachulski,  
Plan Administrator for Bankruptcy  
Estate of Randall William Blanchard

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re:

RANDALL WILLIAM BLANCHARD,  
  
Debtor.

RICHARD M. PACHULSKI, PLAN  
ADMINISTRATOR FOR BANKRUPTCY  
ESTATE OF RANDALL W. BLANCHARD,

Plaintiff,

v.

RANDALL W. BLANCHARD,

Defendant.

Case No.: 8:14-bk-14105-SC

Chapter 11

Adv. Case No.: 8:24-ap-01037-SC

**STIPULATION RE: SETTLEMENT  
AND REQUEST TO EXTEND  
DEADLINES**

**Status Conference:**

Date: August 28, 2024

Time: 11:00 AM

Place: Courtroom 5C  
411 Fourth Street  
Santa Ana, CA 92701

Judge: Hon. Scott C. Clarkson

Richard M. Pachulski, Plan Administrator for the Bankruptcy Estate of Randall W. Blanchard, ("Plaintiff"), and Randall W. Blanchard ("Defendant") (collectively, the "Parties") enter into this stipulation which they submit for Court approval based upon the following facts:

1. Plaintiff filed this adversary case on March 15, 2024 (the "Complaint").
2. Pursuant to the *Order Approving Stipulation Extending Deadline For Defendant to Answer The Complaint And Continuing Status Conference* entered on June 13, 2024 [Dkt. No. 8],

1 the current deadline for Defendant to file a responsive pleading to the Complaint was August 1, 2024  
2 and the status conference was continued to August 28, 2024, at 11:00 a.m., with a status report due  
3 14 days in advance.

4 3. The Parties have reached a settlement to resolve the litigation referenced in the  
5 Complaint which they are in the process of documenting. The settlement will resolve the litigation in  
6 its entirety. The latest date under the settlement terms is September 30, 2024, at which time the  
7 settlement will be fully effectuated.

8 4. The Parties desire to extend and adjourn all future dates for approximately  
9 seventy-five (75) days in order to allow time for the Parties to document and effectuate the  
10 settlement, The litigation would be dismissed immediately thereafter.

11 5. The Stipulation is submitted to conserve costs and judicial resources and is filed in  
12 good faith and not for any improper purpose.

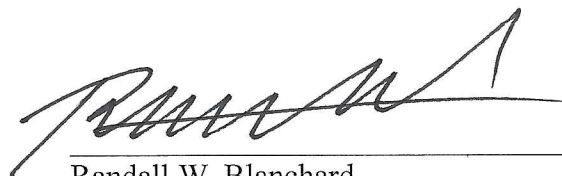
13 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE to:

14 6. Extend the Deadline for Defendant to Answer the Complaint through and including  
15 October 1, 2024.

16 7. For an adjournment of any other deadlines as the Court deems just and appropriate  
17 under the circumstances.

18  
19 Date: August \_\_, 2024

20  
21 By



Randall W. Blanchard  
In Pro Per

22  
23 Dated: August 13, 2024

PACHULSKI STANG ZIEHL & JONES LLP

24  
25 By

/s/ Jeffrey P. Nolan

Jeffrey P. Nolan

26 Attorneys for Plaintiff Richard M.  
27 Pachulski, Plan Administrator for  
28 Bankruptcy Estate of Randall William  
Blanchard

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION REGARDING SETTLEMENT AND REQUEST TO EXTEND DEADLINES** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) August 13, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Jeffrey P Nolan** jnolan@pszjlaw.com
- **Richard M. Pachulski (TR)** rmp@pszy.com
- **United States Trustee (SA)** ustpreregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) August 13, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) August 13, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Overnight Mail  
Hon. Scott Clarkson  
United States Bankruptcy Court  
411 W. Fourth Street, Courtroom 5-C  
Santa Ana, CA 92701

Via Email  
Randall W. Blanchard  
[randy@sanddollarpartners.com](mailto:randy@sanddollarpartners.com)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 13, 2024  
Date

Rolanda Mori  
Printed Name

/s/ Rolanda Mori  
Signature